

**PAUL BATISTA, P.C.
Attorney-at-Law
26 Broadway – Suite 1900
New York, New York 10004
(631) 377-0111**

e-mail: Batista007@aol.com

Facsimile: (212) 344-7677

January 24, 2024

VIA ECF

Hon. Ramon E. Reyes, Jr.
United States District Judge for the
Eastern District of New York
United States District Court
225 Cadman Plaza East
Courtroom 2E North
Brooklyn, New York 11201

**Re: Rivka Mandel v. Jacob Daskal,
1:23-cv-07352 (RER) (VMS)**

Dear Judge Reyes:

I represent plaintiff Rivka Mandel in the above-entitled litigation.

I write respectfully to request a two (2) day extension, from January 24, 2024 to Friday, January 26, 2024, of Ms. Mandel's time to file the Amended Complaint in this action.

As I indicated in the letter to Your Honor filed on January 8, 2024, the primary reason for that request, as for this one, is that like many households in New York, my family, including my four grandchildren, has undergone and continues to undergo respiratory infections.

While that situation has somewhat abated, it persists and has complicated my preparation of the Amended Complaint.

Moreover, in recent weeks, I have undergone staff issues that have also complicated completion of the Amended Complaint.

I fully anticipate meeting a filing date of January 26, 2024 – two days from now – for the service and filing of the Amended Complaint.

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I have, of course, requested the consents of plaintiff's counsel to this request. We have enjoyed a strong sense of professional courtesy, and I do not anticipate opposition to this request.

Respectfully submitted,

A handwritten signature in red ink, appearing to be 'P. Batista', with a stylized flourish extending to the right.

Paul Batista

cc: All Counsel of Record